

ZMO LAW PLLC

MEMO ENDORSED

December 17, 2024

Via ECF and email

Hon. Valerie E. Caproni
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
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DATE FILED: 12/18/2024

RE: *United States v. Christopher Reese*, 24 Cr. 402 (VEC)

Dear Judge Caproni:

This office represents Christopher Reese in the above-captioned matter. We write to request permission to file under seal the violation report filed against Mr. Reese on August 31, 2022 in *U.S. v. Reese*, 12 Cr. 629, before Judge Marrero. This violation report is attached to the attorney affirmation filed in support of Mr. Reese's pretrial motions, as Exhibit A. ECF No. 60

This violation report was submitted to Judge Marrero under seal and remains under seal at this time.¹ AUSA Josiah Pertz advised us that the government's position is that the violation report should not be submitted on the public docket unless and until Judge Marrero orders it unsealed.

Thank you for your attention to this case.

Very truly yours,

Tess M. Cohen

Tess M. Cohen
Partner

Encls. Exhibit A (via email only)

CC: AUSA Timothy Josiah Pertz, AUSA Derek Wikstrom, AUSA Kingdar Prussiem

¹ A review of the docket reveals the violation report is not on the public docket.

Application GRANTED. If Judge Marrero orders that the violation report be unsealed in 12-CR-629, counsel for the Defendant must file Exhibit A on the public docket.

SO ORDERED.

 12/18/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE